

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	Case No.: 18-17422
Edward F. Titus and	:	
Jessica A. Titus	:	
	:	
Debtors	:	Chapter 13

RESPONSE OF THE DEBTORS TO THE CERTIFICATE OF DEFAULT

1. Admitted.
2. Admitted.
3. Admitted only to the verbiage of the Stipulation, it is denied that the Debtors are delinquent.
4. Denied. Debtor alleges that he made payments that were not credited. The Debtor is researching said payments. In the event that the payments were not timely made, the Debtor is prepared to cure any and all delinquencies that may exist.
5. Denied.

WHEREFORE, Debtors, respectfully request that this Court deny an Order Granting Relief from the Automatic Stay.

/s/Brad J. Sadek, Esquire
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Dated: January 7, 2020